

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:19cr19
)	
TROY GEORGE SKINNER,)	
Defendant)	

MOTION TO EXTEND MOTIONS IN LIMINE DEADLINES

Troy Skinner, through counsel, moves the Court to extend the current deadlines set for motions in limine. In support of this motion, Mr. Skinner states the following:

1. The government has charged Mr. Skinner with several crimes carrying lengthy mandatory minimum sentences. *See* ECF No. 18.
2. The Court arraigned Mr. Skinner on February 19, 2019. Mr. Skinner pled not guilty to all counts and requested a jury trial. Because of the complexity of the case and the need for additional time to prepare for the trial, Mr. Skinner moved the Court to set the trial in this case past the Speedy Trial Act deadline. *See* ECF No. 21. The Court granted that motion and scheduled the trial to begin the week of September 16, 2019. The Court issued a written scheduling order directing the parties to file motions in limine by September 9, 2019, which was one week before trial. *See* ECF No. 22. The Court directed all responses to motions in limine to be filed by September 12, 2019, which was four days before trial. *Id.*
3. On March 15, 2019, Mr. Skinner filed an unopposed motion to continue the trial due to defense scheduling conflicts the week of September 16, 2019. *See* ECF No. 23. On March 19, 2019, the Court granted that motion and rescheduled the trial to begin

Tuesday, November 12, 2019. *See* ECF No. 24. The Court ordered that all other deadlines remain intact. *Id.*

4. On April 5, 2019, the defense filed several motions relating to Mr. Skinner's constitutional rights, which remain pending with the Court. *See* ECF Nos. 25-33.
5. Both parties to this case have continued to investigate the allegations in this case. The defense is not prepared to file a complete list of motions in limine at this time due to these ongoing investigations. The Court's original scheduling order directed the parties to file motions in limine by close of business on September 9, 2019. The Court subsequently continued the trial to begin on November 12, 2019. Due to this continuance and the ongoing investigations from both the defense and the prosecution, which will almost certainly either resolve current evidentiary issues or generate additional issues in the coming weeks, Mr. Skinner moves the Court to extend the motions in limine deadline in this case.
6. To allow sufficient time for the parties to continue their investigations and for the Court to prepare for anticipated motions in limine, Mr. Skinner moves the Court to extend the filing deadline for motions in limine to Friday, October 18, 2019; any responses to be due Friday, October 25, 2019; and any replies to be due Wednesday, October 30, 2019.
7. Mr. Skinner makes this motion pursuant to his Sixth Amendment rights to effective assistance of counsel and to mount and present a defense and his Fifth Amendment right to due process.

Thus, as set forth above, Mr. Skinner moves the Court to extend the motions in limine deadline to Friday, October 18, 2019; any responses to be due Friday, October 25, 2019; and any replies to be due Wednesday, October 30, 2019.

Respectfully submitted,
TROY GEORGE SKINNER

By: _____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2019, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a copy of this filing to all counsel of record.

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